



FEMA Requirement C2: NFIP Participation

Does the Plan address each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate?

Local Mitigation Plan Review Guide, FEMA, 2011, page 23

This “Good Practice” document is intended to help plan developers understand the FEMA requirement to describe each jurisdiction's participation in the National Flood Insurance Program (NFIP) and continued compliance. Plan developers often provide too little information to meet this requirement. Documenting current and future local involvement can lead to better understanding of community floodplain management and insights for improvement.

Common Reasons Why FEMA Returns Plans for C2 Revisions

1. The plan fails to note if a jurisdiction does or does not participate in the NFIP.

Tip: Include the date the community joined the NFIP.

Tip: State if the jurisdiction participates in the NFIP Community Rating System (CRS) and at what level.

Tip: Describe if the community is currently suspended from the NFIP, withdrew, or did not apply.

2. The plan does not state if a Flood Hazard Boundary Map (FHBM) or Flood Insurance Rate Map (FIRM) was issued for the community.

Tip: Provide the map date. State if the FIRM or FHBM was officially adopted by the community. Describe any anticipated map revisions or local requests for map updates.

Note: A community can participate in the NFIP, irrespective of whether a FHBM or FIRM was issued.

3. The jurisdiction's current floodplain management program is not described, including if a municipal floodplain ordinance or zoning regulation is in place.

Tip: Identify the municipal position or agency responsible for enforcement.

Tip: Provide details regarding the type and adoption date of applicable ordinances or regulations.

Tip: Describe past or existing compliance issues, and discuss steps taken for resolution.

Tip: Discuss past and present activities in public education and assistance.

Note: See the attachment at the end of this guide for a sample worksheet to collect information on your community's participation in the NFIP. This worksheet is from pages A-27 and A-28 of FEMA's Local Mitigation Planning Handbook, March 2013 edition.

4. Continued compliance with the NFIP is not explained. The plan simply says the community will continue to comply without describing how this will be accomplished.

Tip: State if community flood hazard ordinances or zoning regulations will continue to be enforced. Identify any proposed or anticipated improvements to the ordinances or regulations.

Tip: Describe how community programs for enforcement, public education and assistance are anticipated to change or remain the same.

Improvements may include:

- Efforts to apply and qualify for CRS status or to qualify at a higher level.
- Steps proposed or underway for resolution of existing compliance issues.
- Resolution of municipal problems in meeting NFIP requirements. Such difficulties might include position vacancies, community receivership, or other internal issues.

Note: See the attachment at the end of this guide for a sample worksheet to collect information on your community's participation in and continued compliance with the NFIP, as well as identify areas for improvement. This worksheet is from pages A-27 and A-28 of FEMA's Local Mitigation Planning Handbook, March 2013 edition.

5. No reason is given why a jurisdiction is not participating in the NFIP.

Tip: Explain the past history, such as municipal efforts to pass floodplain ordinances or zoning, local support or opposition, the lack of an issued FHB or FIRM, etc.

Tip: Discuss contributing factors affecting local support, such as a lack of structures in designated floodplains, or that Special Flood Hazard Areas do not exist within the jurisdiction – for instance, if the entire jurisdiction lays within a Zone C.

Plans Demonstrating Good Practice for Requirement C2

This section provides two examples of plans from Rochester, VT and Brattleboro, VT. These abstracts are intended to illustrate good practices in meeting the requirements. They are preceded by a brief explanation of why requirements are met. In addition, practices going “Beyond Minimum Requirements” are noted. Other approaches are possible, and should fit the particular circumstances of the community.

Example 1: *Town of Rochester, Vermont Local Hazard Mitigation Plan*

Why This Plan Demonstrates Good Practice

1. NFIP participation is stated as an existing municipal hazard mitigation program.
2. The community is shown as participating in the NFIP through town zoning containing a Flood Hazard Bylaw. This zoning is described as restricting development within Special Flood Hazard Areas as part of Floodplain Overlay Districts.

Beyond Minimum Requirements: The plan states the adoption date of the town Flood Hazard Bylaw.

Beyond Minimum Requirements: The Floodplain Overlay District is described as regulating new structures and activities including a 50-foot setback from any river or perennial stream bank (which is above minimum NFIP requirements.)

3. The plan states there is a currently effective Flood Insurance Rate Map (FIRM).
Beyond Minimum Requirements: The present FIRM is identified by date and noted as an update.

Beyond Minimum Requirements: The dates of the initial Flood Hazard Boundary Map (FHBM) and original FIRM are provided.

4. The town Zoning Administrator is identified as the NFIP Administrator responsible for enforcing the Flood Hazard Bylaw.

5. Continued compliance with the NFIP is shown through existing programs and by explaining that elements of this Hazard Mitigation Plan will be incorporated into town zoning regulations and flood hazard/fluviol erosion hazard bylaws.

Tip: Specifically describe anticipated changes to regulations and bylaws, as well as the reasons prompting alterations and the desired result.

Tip: Describe public education efforts and any related compliance issues.

See Abstract on next page.

Abstracts from pages 9, 19, 28 and 29

Town of Rochester, Vermont Local Hazard Mitigation Plan

D. Existing Hazard Mitigation Programs, Projects & Activities

(selected portions)

The Town of Rochester is currently engaged in the following hazard mitigation programs, projects and activities:

Insurance Programs

- ☐ Participation in National Flood Insurance Program (NFIP)
 - Rochester's initial Flood Hazard Boundary Map was identified on 12/20/74 and their initial Flood Insurance Rate Map (FIRM) was dated 8/5/91. The Town's FIRM has been updated, and the current effective map date is 9/28/07. The Rochester Zoning Administrator serves as the NFIP Administrator.
 - Zoning Regulations adopted on 9/28/2009 contain their Flood Hazard Bylaw, and limitations/requirements for new development within the Special Flood Hazard Areas.

Land Use Planning

- ☐ Rochester Town Plan
 - Readopted on 04/30/2012. A new Town Plan is currently being drafted.
- ☐ Zoning Regulations
 - Adopted on 09/28/2009
 - Includes Flood Hazard Bylaw and limitations/requirements for development within the Special Flood Hazard Areas.
- ☐ Rochester's Hazard Mitigation Plan (Annex)
 - Adopted 04/27/2009

B. Hazard Profiles For "Top Hazards"

(selected portions)

2. Flash Flood/Flood/Fluvial Erosion

The Town of Rochester Floodplain Overlay District prohibits new structures in the floodplain and places restrictions on other types of activities within the floodplain. It also specifies land, area and structural requirements in the Floodplain Overlay Districts. The town bylaw has a 50-foot setback prohibition of structures being located from the top of any river or perennial stream bank within the Overlay District. These buffers seek to protect the fragile riparian habitat, improve or maintain water quality and prevent soil erosion.

B. Hazard Mitigation Strategies: Programs, Projects & Activities

(selected portions)

The following strategies will be incorporated into the Town of Rochester's long-term land use and development planning documents. In addition, the Town will review and incorporate elements of this Local Hazard Mitigation Plan into updates for the municipal plan, zoning regulations, and flood hazard/fluviat erosion hazards (FEH) bylaws. The incorporation of the goals and strategies listed in the Local Hazard Mitigation Plan into the municipal plan, zoning regulations and flood hazard/FEH bylaws will also be considered after declared or local disasters.

Example 2: 2015 All Hazard Mitigation Plan, Town of Brattleboro, Windham County, Vermont

Why This Plan Demonstrates Good Practice

1. The community is acknowledged as an NFIP participant under the NFIP compliance section, as well as within two sections on existing programs and on planning.

Beyond Minimum Requirements: Past and current details of the town's participation are discussed, including record keeping, NFIP information distribution, tracking of structural repairs and improvements, 22 acquisitions/relocations, and current Base Flood Elevation requirements.

Beyond Minimum Requirements: The community is identified as a CRS member since 1992 and at a current CRS level 9. Benefits of the CRS program are explained.

2. Local Flood Hazard Area regulations are in place to regulate development in SFHA and the floodway. Town zoning bylaws contain these regulations.

Beyond Minimum Requirements: Existing flood hazard regulations are explained as higher regulatory standards than the FEMA minimum requirements.

3. The plan states there is a currently effective Flood Insurance Rate Map (FIRM).

Tip: Include the effective map date in the plan.

Beyond Minimum Requirements: The plan notes the date that the updated FIRM was adopted by the community.

4. The town Zoning Administrator is the CRS coordinator responsible for site plan inspections and enforcement of zoning, such as the town flood hazard regulations.

Tip: Explain what the compliance program consists of, for instance - field inspections, reports, public assistance, and/or grant administration. Discuss the role and limitations of the responsible position, such as number of hours per month devoted to enforcement, whether full or part-time, additional staff, coordination with other town offices, etc.

5. Continued compliance with the NFIP is shown through existing programs and details of anticipated improvements.

Beyond Minimum Requirements: Future compliance is explained as including:

- The town will establish conditional use reviews, and enact additional flood hazard area regulations above the NFIP minimum, which are beyond the already enhanced regulations in the community. These

involve prohibiting critical facilities within the Special Flood Hazard Area (SFHA), and possibly increasing local construction requirements to a 2 ft. above Base Flood Elevation for the 1st floor level.

- The community will seek recertification under CRS to a level 7 or 8. Specific activities are included to qualify for this enhancement.
- The town will improve public outreach through town mailings, the municipal website and media use regarding flood insurance and flood hazard mitigation.
- Acquisition and relocation of 70 mobile homes and 80 residential units is proposed within a local Special Flood Hazard Area with a history of flood damage.

See Abstracts on this and the following pages (pages 6-11).

Abstracts from 2015 All Hazard Mitigation Plan, Town of Brattleboro, Windham County, Vermont

PLAN DEVELOPMENT

PUBLIC PARTICIPATION (Selected portions)

Targeted Interviews were held with:

- Gary King, Engineering Technician, GIS Technician, Public Works Department: culverts and bridges.
- Hannah O'Connell, Utilities and Road Supervisor: stormwater and road standards.
- Hannah O'Connell and Steve Barrett, Public Works Director: drought, dam safety, road standards, and stormwater.
- Brian Bannon, Zoning Administrator, CRS Coordinator: CRS and NFIP participation.
- Michael Bucossi, Chief and Peter Lynch, Assistant Chief, Brattleboro Fire Department: rail and interstate impact on response time, EOC replacement, school safety, communications system improvements.

REVIEW OF SUPPORTING MATERIALS

"The Hazard Mitigation Committee reviewed existing plans, reports, studies, policies and regulations to identify hazard mitigation goals and opportunities for changes that would address hazard mitigation goals going forward. These included:" "FEMA community FIRMS"

"The town of Brattleboro will continue to evaluate and update the plan throughout the next 5 year cycle. This will take active involvement on the part of the town department heads to identify and plan for ongoing hazard mitigation work and coordination among stakeholders to identify structures and engineering projects that will mitigate future hazardous events; e.g. bridge and culverts replacements, road replacements and grading, as well as removal or floodproofing of any repetitive loss structures that may be in the Special Flood Hazard Area as identified on FEMA Flood Insurance Rate Maps (FIRMS)."

Continued next page...

EXISTING HAZARD MITIGATION PROGRAMS, PROJECTS AND ACTIVITIES *(selected portions)*

The following policies, programs and activities related to hazard mitigation are currently in place and/or being implemented in the town of Brattleboro. The Committee analyzed these programs for their effectiveness and noted any improvements needed. Town services are currently constrained by level –service budgeting; there is a likelihood of level funding budgeting in future, improved services will require better coordination between departments; elimination of redundant services; and improved coordination with third parties. An example of such an effort includes the development of a Program for Public Information (PPI) that addresses shared areas of concern between departments with outreach efforts attached to current mailings, posted on existing town website, and disseminated by private media.

Type of Existing Protection	Description	Effectiveness/ Enforcement/Hazard that is addressed	Gaps in Existing Protection/ Improvements Needed	Potential Improvements
Subdivision Regulations	Regulates the division of land, standards for site access and utilities, slope protection, and road design	Riparian protection, steep slopes, emergency response, infrastructure, and access	New regulation under public review	Promote conservation subdivision to concentrate development in low hazard areas and protect infrastructure from natural hazard; restrict creation of new parcels in SFHA where possible; insure new parcels can be developed without impacting steep slopes.
Flood Hazard Area Regulations	Regulates development in FEMA flood hazard areas	NFIP, CRS member since the early 1990s	Reviewed as part of Zoning Bylaw rewrite	Prohibit critical facilities in SFHA; examine adopting bfe+2 standard; treat new structures as conditional rather than permitted uses in SFHA.
NFIP CRS Program	Improves Town outreach to individuals for map information, insurance promotion, hazard mitigation technical support and grant funding	Flood Hazard, Flood Hazard Mitigation	Seek recertification at level 7 or 8; currently level 9	Identify streamside parcels appropriate for restoration as natural floodplain function open space; encourage and support buyouts and elevation and floodproofing of structures; develop PIO with other departments to improve outreach while exploiting existing town mailings & webpage and private media.
Site Plan Review (SPR)	Site development standards	Stormwater, access, impervious surfaces, riparian impact	Reviewed as part of Zoning Bylaw rewrite	Require review of impacts of steep slope; implement more rigorous stormwater review; encourage LID; require erosion control.
Conditional Use Review	Regulation of new structures in SFHA	New impacts on SFHA	Current regulations allow development of new structures in flood fringe as permitted uses,	Establish strict standards for CUP for new structures in SFHA.
Zoning enforcement	Insures adherence to site plan, stormwater, erosion control and flood hazard regulations	Flood, erosion	Training on proper stormwater structure construction and maintenance needed	Improved coordination with public works in evaluating stormwater and infrastructure improvements; coordinate training opportunities.

IDENTIFICATION AND ANALYSIS OF FUTURE MITIGATION ACTIONS *(selected portions)*

The attendees of the Hazard Mitigation Committee meetings identified the following new hazard mitigation activities based on an evaluation of hazard event vulnerability not addressed by existing hazard mitigation initiatives and on the feasibility of new activities.

Regulations

6. CRS recertification at 7 or 8: a higher rating will be accomplished by documenting an improved public information program; supporting buyouts in highest risk areas; preserving public lands as natural flood plain function open space; supporting flood proofing retrofits for flood fringe properties through technical assistance and grant applications; multi-hazard mitigation planning; early warning system; and, protection of open space for recreational purposes.

Buyouts and Relocations:

1. Mountain Home Park mobile home relocations: the Park has more than 70 dwellings located in the Special Flood Hazard Area of the Whetstone Brook. The homes are in repetitive loss and fluvial erosion hazard areas. There is an extensive history of evacuations and flood damage. Removing the homes and restoring the land's flood plain function will reduce risk to life and property in West Brattleboro.
2. Brattleboro Housing Authority Melrose Terrace relocation: Brattleboro Housing Authority has more than 80 semi-detached dwelling units located in the Special Flood Hazard Area of the Whetstone Brook. The homes are in repetitive loss and a fluvial erosion hazard areas. There is an extensive history of evacuations and flood damage. Removing the homes and restoring the land's flood plain function will reduce risk to life and property in West Brattleboro.

Program for Public Information:

1. Coordinate efforts of the Fire Department, Public Works, Parks & Recreation, and Planning to increase public awareness of flood event safety in the home and while driving, storm water system maintenance, proper pet waste removal and water quality, flood hazard mitigation, flood insurance promotion and other public information goals as identified in the outreach planning process.

NATIONAL FLOOD INSURANCE PROGRAM (NFIP) COMPLIANCE

The town of Brattleboro is a participating member of the NFIP and the Community Rating Systems (CRS). There are only three communities in the state of Vermont that participate in the CRS and Brattleboro is proud to be one of those three. Brattleboro is rated as a CRS class 9 community, which means that policy holders in Town receive a 5% discount on their flood insurance policies. Brattleboro has been a member of the CRS since September 1992. Brattleboro's participation is based on providing public flood hazard maps and information, insurance promotion, open space conservation, stormwater system maintenance, and structure removal.

- As of 2011, there were 111 flood insurance policies. During the Town's participation in the NFIP, there have been 63 flood insurance claims totaling \$1,654,097. Claims were for 7 flood events on 8.30.2011, 8.29.2011, 8.28.2011, 10.7.2005, 10.8.2005, 10.9.2005, 8.30.2004, 8.31.2004, 9.16.1999, 2.11.1981, 5.26.1979, & 5.15.1978
- Brattleboro flood hazard regulations adhere to higher regulatory standards than FEMA minimum requirements; they require one foot of freeboard, prohibit residential development in the floodway and monitor cumulative substantial improvement with a rolling three year period.

- All new and substantially improved structures conform to NFIP standards, using elevation for residential structures and flood proofing or elevation for commercial structures. All repairs or improvements to structures in the SFHA must be permitted and the cost of improvements or repairs is tracked for ongoing compliance.
- Brattleboro participated actively in FEMA's map update for the community, adopting new maps on September 28, 2007.
- Records of all permits, elevation certificates, flood proofing certificates and LOMAs are kept and made available to the public on request.
- Brattleboro supplies map information, technical assistance and support for hazard mitigation grant applications for private land owners and members of the public.
- The Town conducts public information outreach to advertise these services to the public and notify land owners in the SFHA that they are eligible for flood insurance coverage.
- The Town maintains its stormwater system to minimize localized flooding.
- The Town maintains flood plain function open space in the SFHA; has supported private conservation efforts to preserve flood plain function open space; and has required the preservation of flood plain function open space as a condition of Planned Unit Development approvals.
- In addition, the Town maintains open space for recreation use in the SFHA.
- The Town insures that land preserved through structure buyouts remains undeveloped.
- The Town is supporting structure buyouts and structure elevation or floodproofing in the SFHA.

IMPLEMENTATION OF MITIGATION ACTIONS

Mitigation activities and projects will draw on the existing administrative capacity of the town, including grant writing, project management, construction, site plan inspections by the Zoning Administrator/CRS coordinator and the Fire Department, and community organizing capacity.

RANKING OF MITIGATION ACTIONS

The Table of Actions ranks the priority of the mitigation activities: *(selected portions)*

HAZARD BEING MITIGATED	VULNERABILITY ADDRESSED	PROJECT	RESPONSIBLE PARTY	TIME FRAME	FUNDING SOURCE	PROJECT PRIORITY	COST / BENEFIT	COMMITTEE RANKING
Flood/ Mass Casualty Event	Remove Low Income, Senior & Disabled persons from SFHA	Support Tri-Park mobile home relocation	Tri-Park Cooperative Housing	2013-20192	TBD HMGP CDBG-DR	High	H/H	High
Flood	Improve flood resilience.	CRS recertification at 8 or 7 level	Zoning Administrator	2016	Department Budget	Medium	L/H	Medium

2010 BRATTLEBORO HMP AND POST IRENE MITIGATION ACTIONS PLAN REVIEW

Brattleboro has completed the actions adopted in the 2010 Hazard Mitigation Plan except for the Chestnut Hill Dam Filling Project. That project was rejected by citizens who wished to maintain the reservoir, a historic and scenic resource. The risk reduction goals of the action will be achieved through the construction of an overflow structure; the project is identified as an action in this plan.

Brattleboro reconsidered hazard mitigation activities in light of Hurricane Irene. Reconstruction projects were designed to reduce future risks through higher standards; the Town also supported property buyouts. Replacement bridge spans are longer and new culverts are larger to accommodate high water.

Private property owners have been encouraged to incorporate flood resistant repairs as they rebuild.

The Town has put renewed support behind removing dwelling units from the SFHA. Since the 2010 Hazard Mitigation Plan, mitigation efforts have lengthened three bridges; replaced 6 undersized culverts and added 3 culverts to Ames and Barrows Roads to prevent future washouts; removed 22 residences from the SFHA; and, floodproofed critical infrastructure in the SFHA: the Wastewater Treatment Plant and the Spring Tree Pumping Station. These efforts have decreased risk from flood, infrastructure catastrophic failure, and water supply contamination.

The 2010 Brattleboro Hazard Mitigation plan identified the following actions: *(selected portions)*

Engineering Projects	Status:
Water/Wastewater Plant Upgrade	The project is substantially complete; new structures conform to NFIP Standards
Policy Changes	
Completion of SGA Phase 3 River Corridor Management Plan	The plan has been completed. A new study to reflect changes caused by Hurricane Irene is planned. Implementation of new regulations is a goal of the Town Plan.

Brattleboro's response to Hurricane Irene reconstruction has included activities to increase future flood resilience: *(selected portions)*

Buyout	Status:
805 Western Avenue, a substantially damaged residence	The buyout is in process
Hazard Mitigation Grant	
427 Marlboro Road, flood proofing of a repetitive loss property	The Town has submitted a HMGP application.
Regulation Implementation	
Flood Hazard ban on reconstruction of residences in floodway	19 homes removed from a repetitive loss area
Flood Hazard substantial improvement	2 structures retrofitted to conform to NFIP standards
Flood Hazard permit requirements	66 structures repaired with flood resistant materials to minimize future flood damage
Tri Park/Town mobile home relocation agreement	3 homes removed from a repetitive loss area

INCORPORATING INTO EXISTING PLANNING MECHANISMS (selected portions)

The following policies, programs and activities related to hazard mitigation are currently in place and/or being implemented in the town of Brattleboro.

Type of Existing Protection	Description	Hazard that is addressed	Incorporation of Hazard Mitigation Goals
Flood Hazard Area Regulations	Regulates development in FEMA flood hazard areas	NFIP, CRS member since the early 1990s	Higher standards will be adopted to prohibit new critical facilities in SFHA; fluvial erosion hazard regulations will be considered as outlined in Plan; Flood Hazard review approvals must be compatible with HMP per ordinance
NFIP CRS Program	Improves Town outreach to individuals for map information, insurance promotion, hazard mitigation technical support and grant funding	Flood hazard, flood hazard mitigation	Will include improved public information outreach; improvement to stormwater maintenance record keeping; preservation of open space and open space flood plain function lands, including identification of existing public lands suitable for flood plain restoration as outlined in plan.
Site Plan Review (SPR)	Site development standards	Stormwater, access, impervious surfaces, riparian impact	Implement steep slope regulations improve erosion control and stormwater management, including encouraging LID best management practices
Zoning enforcement	Enforce stricter land use standards called for in the plan	Zoning enforcement	Enforce stricter land use standards called for in the plan

C2 Regulatory Guidance

Abstracts from *Code of Federal Regulations and Local Mitigation Plan Review Guide, October 1, 2011*

Element C2 Regulation [§201.6(c) (3) (ii)] (page 22)

All plans approved by FEMA after October 1, 2008, must also address the jurisdiction's participation in the NFIP, and continued compliance with NFIP requirements, as appropriate.

Element Intent (page 23)

To demonstrate flood hazard mitigation efforts by the community through NFIP activities. Where FEMA is the official administering Federal agency of the NFIP, participation in the program is a basic community capability and resource for flood hazard mitigation activities.

Element Requirements (page 23)

- a. The plan **must** describe each jurisdiction's participation in the NFIP and describe their floodplain management program for continued compliance. Simply stating "The community will continue to comply with NFIP," will not meet this requirement. The description could include, but is not limited to:
 - Adoption and enforcement of floodplain management requirements, including regulating new construction in Special Flood Hazard Areas (SFHAs);
 - Floodplain identification and mapping, including any local requests for map updates; or
 - Description of community assistance and monitoring activities.

Jurisdictions that are currently not participating in the NFIP and where an FHBM or FIRM has been issued may meet this requirement by describing the reasons why the community does not participate.

Check Out These Additional Aids

Local Mitigation Plan Review Guide, October 2011

<http://www.fema.gov/media-library/assets/documents/23194>

Local Mitigation Planning Handbook, March 2013 (pages 4-4 to 4-5, A-27 to A-28)

<http://www.fema.gov/media-library/assets/documents/31598>

Attachment**National Flood Insurance Program (NFIP) Worksheet**

Use this worksheet to collect information on your community's participation in and continued compliance with the NFIP, as well as identify areas for improvement that could be potential mitigation actions. Indicate the source of information, if different from the one included.

NFIP Topic	Source of Information	Comments
Insurance Summary		
How many NFIP policies are in the community? What is the total premium and coverage?	State NFIP Coordinator or FEMA NFIP Specialist	
How many claims have been paid in the community? What is the total amount of paid claims? How many of the claims were for substantial damage?	FEMA NFIP or Insurance Specialist	
How many structures are exposed to flood risk within the community?	Community Floodplain Administrator (FPA)	
Describe any areas of flood risk with limited NFIP policy coverage	Community FPA and FEMA Insurance Specialist	
Staff Resources		
Is the Community FPA or NFIP Coordinator certified?	Community FPA	
Is floodplain management an auxiliary function?	Community FPA	
Provide an explanation of NFIP administration services (e.g., permit review, GIS, education or outreach, inspections, engineering capability)	Community FPA	
What are the barriers to running an effective NFIP program in the community, if any?	Community FPA	
Compliance History		
Is the community in good standing with the NFIP?	State NFIP Coordinator, FEMA NFIP Specialist, community records	
Are there any outstanding compliance issues (i.e., current violations)?		
When was the most recent Community Assistance Visit (CAV) or Community Assistance Contact (CAC)?		
Is a CAV or CAC scheduled or needed?		

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NFIP Topic	Source of Information	Comments
Regulation		
When did the community enter the NFIP?	Community Status Book www.fema.gov/national-flood-insurance-program/national-flood-insurance-program-community-status-book	
Are the FIRMs digital or paper?	Community FPA	
Do floodplain development regulations meet or exceed FEMA or State minimum requirements? If so, in what ways?	Community FPA	
Provide an explanation of the permitting process.	Community FPA, State, FEMA NFIP Flood Insurance Manual www.fema.gov/flood-insurance-manual Community FPA, FEMA CRS Coordinator, ISO representative CRS manual http://www.fema.gov/library/viewRecord.do?id=2434	
Community Rating System (CRS)		
Does the community participate in CRS?	Community FPA, State, FEMA NFIP	
What is the community's CRS Class Ranking?	Flood Insurance Manual http://www.fema.gov/flood-insurance-manual	
What categories and activities provide CRS points and how can the class be improved?		
Does the plan include CRS planning requirements	Community FPA, FEMA CRS Coordinator, ISO representative CRS manual www.fema.gov/library/viewRecord.do?id=2434	